

is noted that claims 10 and 11, which are indicated as allowable, are directed to a method of hydrostatic testing followed by dewatering. The claims 1-6 and 13 are requested to remain in this application until allowance or appeal.

The rejection of claims 7, 9 and 12 under 35 U.S.C. 103(a) as being unpatentable over Bliss et al. in view of Graves is respectfully traversed. The Examiner recognizes the deficiency of Bliss. The Bliss patent discloses: "The flood pumping and pressure testing equipment is connected to the pig launcher on the production facility PF." The pig launcher L is on the production facility PF which is out of the water.

The Graves patent discloses (column 4, lines 1-9):

"A facility for providing a supply of pressurized water, in order to drive the pig over the final stage of the operation.(sic) This might consist simply of a connection point for the supply of a flow of water (possibly containing additive chemicals) from the surface, when a support vessel arrives to complete the task.

Alternatively, a power supply from the surface or from a remotely operated vehicle might be used to drive a boost pump 22 located in a bypass 26."
(emphasis added)

It is respectfully emphasized that the Graves patent teaches that the pipeline or the initial movement of the pig in the pipeline is accomplished **with out the use of pumps but by the head of water above the inlet conduit.** It is only "in order to drive the pig over the final stage of the operation" that a pump is used.

Claim 7 recites:

"using a SV to operate pumps on a fill and test package to force seawater behind the pig and **move the pig from the pig launcher/receiver to the pig receiver;**".

It is respectfully submitted that Graves fails to disclose this recited operation or make such a step obvious. It is the essence of the teaching of the Graves patent that the initial movement of the pig in the pipeline be done using solely the head of water above the pipeline.

Claim 12 recites:

“using at least one *subsea water pump* to propel at least one pig down the line and to **raise the internal pressure of the pipeline sufficiently for hydrostatic testing of the pipeline;**”. It is respectfully submitted that Graves fails to disclose this operation or make such a step obvious. There is no disclosure in the Graves patent of raising the internal pressure sufficiently for **hydrostatic testing of the pipeline.**

The conclusion of obvious as to one skilled in the art is respectfully traversed. Both Bliss and Graves represent persons skilled in the art and while both disclose the use of ROV's, neither disclose the use of the ROV to power pumps on a skid either carried by the ROV or placed near the inlet of a pig launcher to move the pig **from the pig launcher/receiver to the pig receiver or the hydrostatic testing of the pipeline.** Accordingly, the rejection is considered in error and the difference between the claim language and the prior art is considered patentable. The claims are patentably distinct from any teaching in the combined patents and should be allowed.

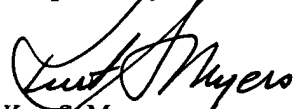
There is nothing in the two patents cited that suggests nor makes obvious any combination of the teachings of the individual patents. If combined with any reasonable consideration of the teachings of the individual patents, the modified operation would be to use the teachings of Graves to employ the head of water to fill or partially fill the pipeline with water and move the pig as far as the head would move the pig. The claimed

invention however is that pumps operated by the SV move the pig from the pig launcher/receiver to the pig receiver (claim 7) or raise the internal pressure of the pipeline sufficiently for hydrostatic testing of the pipeline (claim 12). There is no modification of Bliss and Graves that disclose or make obvious these **claimed** operations.

The claims 8 and 9 have been objected to but are allowable for the same reasons set forth above as to independent claim on which they depend. The Examiner's comments with regard to claim 9 are respectfully traversed. The general comment that SV's may carry toolskids is questioned in the absence of any reference disclosing a SV carrying a toolskid. Certainly the lack of any reference is evidence that there is no art showing a SV carrying the necessary equipment for pigging an underwater pipeline or for carrying out the hydrostatic testing of a pipeline.

Applicant has responded to each and every ground of objection or rejection made by the Examiner. The Examiner's reconsideration is respectfully requested.

Respectfully submitted,



Kurt S. Myers
Attorney for Applicant
Reg. No. 20,244
7634 Braesdale
Houston, Texas 77071
(713) 774-7152

CERTIFICATE OF MAILING

I hereby certify that this Transmittal Letter is being deposited with the U.S. Postal Service as Express Mail (ET197883848US) in an envelope addressed to the Commissioner of Patents and Trademarks, Washington, D. C. 20231 on September 4, 2002.


Kurt S. Myers